

UNITED STATES GOVERNMENT

MEMORANDUM

RECEIVED

DATE: July 18, 2002

JUL 18 2002

REPLY TO

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

ATTN OF: Cathy Carpino
Competition Policy Division
Wireline Competition Bureau
445 12th St., S.W., Room 5-C207
Washington, D.C. 20554

SUBJECT: CC Docket Nos. 00-218, 00-249, and 00-251

TO: Ms. Marlene Dortch
445 12th St., S.W., Room TWB-204
Washington, D.C. 20554

Please place this memorandum and the attached documents in the record in CC Docket Nos. 00-218, 00-249, and 00-251.

The attached documents are **Verizon's Exhibits 32 through 82** and are marked accordingly. We do **not** attach copies of Verizon's Exhibits 1 through 31 because those documents are pre-filed testimony already found in the record and are voluminous. We have also included Verizon's exhibit list.

Additionally, "Verizon Virginia Inc.'s Corrections to WorldCom's Late-Filed Exhibit 52: Responses to Record Requests" should be docketed as **Verizon Exhibit 83** and "Verizon Virginia Inc.'s Objections to AT&T Response to Record Requests from the 10/04/01 Transcript of the FCC-VA Arbitration Proceeding" should be docketed as **Verizon Exhibit 84**. These documents are also attached. Finally, Verizon Exhibit 37 is proprietary and will be provided under a separate cover memorandum. A redacted version of this exhibit has been provided herein.

If you require further information, please contact me at (202) 418-1593. Thank you for your assistance. An original and two copies are provided.

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WorldCom, Cox, and AT&T ads. Verizon
CC Docket Nos. 00-218, 00-249, and 00-251

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

VERIZON VA EXHIBIT LIST

Exhibit	Description
1.	Unbundled Network Elements Direct Testimony on Non-Mediation Issues (filed 7/31/01)
2.	Advanced Services Panel Direct Testimony on Non-Mediation Issues (filed 7/31/01)
3.	Resale Direct Testimony on Non-Mediation Issues (filed 7/31/01)
4.	Network Architecture Direct Testimony on Non-Mediation Issues (filed 7/31/01)
5.	Intercarrier Compensation Direct Testimony on Non-Mediation Issues (filed 7/31/01)
6.	Business Process Direct Testimony on Non-Mediation Issues (filed 7/31/01)
7.	Pricing Terms and Conditions Testimony on Non-Mediation Issues (filed 7/31/01)
8.	Unbundled Network Elements Direct Testimony on Mediation Issues (filed 8/17/01)
9.	Network Architecture Direct Testimony on Mediation Issues (filed 8/17/01)
10.	Business Process Direct Testimony on Mediation Issues (filed 8/17/01)
11.	Pricing Terms and Conditions Direct Testimony on Mediation Issues (filed 8/17/01)
12.	Miscellaneous Direct Testimony on Mediation Issues (filed 8/17/01)
13.	General Terms and Conditions Direct Testimony on Mediation Issues (filed 8/17/01)
14.	Rights of Way Direct Testimony on Mediation Issues (filed 8/17/01)
15.	Unbundled Network Elements Rebuttal Testimony on Non-Mediation Issues (filed 8/17/01)
16.	Advanced Services Panel Corrected Rebuttal Testimony on Non-Mediation Issues (filed 8/30/01)
17.	Resale Rebuttal Testimony on Non-Mediation Issues (filed 8/17/01)
18.	Network Architecture Rebuttal Testimony on Non-Mediation Issues (filed 8/17/01)
19.	Intercarrier Compensation Rebuttal Testimony on Non-Mediation Issues (filed 8/17/01)
20.	Business Process Rebuttal Testimony on Non-Mediation Issues (filed 8/17/01)
21.	Pricing Terms and Conditions Rebuttal Testimony on Non-Mediation Issues (filed 8/17/01)
22.	General Terms and Conditions Rebuttal Testimony on Non-Mediation Issues (filed 8/17/01)
23.	Unbundled Network Elements Additional Direct Testimony on Mediation Issues (filed 8/31/01)
24.	Unbundled Network Elements Rebuttal Testimony on Mediation Issues (filed 9/5/01)
25.	Resale Rebuttal Testimony on Mediation Issues (filed 9/5/01)
26.	Network Architecture Rebuttal Testimony on Mediation Issues (filed 9/5/01)
27.	Business Process Rebuttal Testimony on Mediation Issues (filed 9/5/01)
28.	Pricing Terms and Conditions Rebuttal Testimony on Mediation Issues (filed 9/5/01)
29.	Miscellaneous Rebuttal Testimony on Mediation Issues (filed 9/5/01)
30.	General Terms and Conditions Rebuttal Testimony on Mediation Issues (filed 9/5/01)
31.	Rights of Way Rebuttal Testimony on Mediation Issues (filed 9/5/01)

32.	Verizon Line Splitting Announcement (filed 5/31/01)
33.	Corrections to Exhibit C-1 to Verizon VA's Answer (errata on proposed contract language)
34.	Errata to UNE Rebuttal Testimony on Mediations Issues (Exhibit 24)
35.	Qwest Service Interval Guide
36.	Errata to UNE testimony at Exhibits 1, 8, 15, and 23
37.	AT&T Data Request Response 2-25 (there are 2 exhibits submitted as Exhibit 37)
38.	FCC Report on Data or High Speed Services for Internet Access
39.	AT&T offers to Purchase Excite
40.	AT&T Broadband Report July 2001
41.	Notes/Minutes from NY Collaborative
42.	Sept. 4, 2001 Order of the Mass. DTE
43.	Errata to Advanced Services Testimony (Exhibit 16)
44.	AT&T Data Request Response 2-28
45.	Excerpt from transcript of Talbott testimony in North Carolina
46.	Maps
47.	Verizon Cost Testimony of 7/31/01
48.	Don Albert Drawings on cross-examination
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51.	Don Albert Drawings on cross-examination
52.	Pete D'Amico Drawings
53.	Don Albert Drawings on re-direct
54.	VFX Diagram for Network interconnection discussions
55.	Verizon's May 14, 2001 letter regarding ISP Order
56.	Errata to Business Process Testimony (Exhibits 12 and 29)
57.	Verizon's Proposed Contract Language to WorldCom on Issue VI-1(AA)
58.	Declaration of Jonathan Smith
59.	Don Albert Drawing relating to on Issue VII-6
60.	Verizon's proposed contract language on 911 issues
61.	Unbundled Network Elements Panel Record Request: Interconnection Agreement in Texas (dedicated transport – multiplexing)

62.	Unbundled Network Elements Panel Record Request: Billing history on LIDB dips
63.	Advanced Services Panel Record Request: Methods and Procedures and Service Descriptions Agree Upon in NY DSL Collaborative Minutes
64.	Network Architecture Panel Record Request: IPs within local calling area
65.	Network Architecture Panel Record Request: Newport News tandem
66.	Network Architecture Panel Record Request: Mass. deadline for mid-span meet
67.	Network Architecture Panel Record Request: Number of CO's subtending tandem
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71.	Network Architecture Panel Record Request: Termination of tandem transit
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79.	Intercarrier Compensation Panel Record Request: Verizon's proposal on intercarrier comp.
80.	Intercarrier Compensation Panel Record Request: Geographic location vs. NPA-NXX
81.	Intercarrier Compensation Panel Record Request: Corrected Exhibit 27
82.	Intercarrier Compensation Panel Record Request: Verizon's proposed billing language

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
Petition of WorldCom, Inc. Pursuant)	
to Section 252(e)(5) of the)	
Communications Act for Expedited)	
Preemption of the Jurisdiction of the)	CC Docket No. 00-218
Virginia State Corporation Commission)	
Regarding Interconnection Disputes)	
with Verizon Virginia Inc., and for)	
Expedited Arbitration)	
))	
In the Matter of)	CC Docket No. 00-249
Petition of Cox Virginia Telecom, Inc., etc.)	
))	
In the Matter of)	CC Docket No. 00-251
Petition of AT&T Communications of)	
Virginia Inc., etc.)	

**VERIZON VA'S ERRATA
ON PROPOSED CONTRACT LANGUAGE TO AT&T AND WORLDCOM**

1. Exhibit C-1 to Verizon VA's Answer, strike through "or for future growth" in § 7.2.10.3 of Verizon VA's UNE Attachment to Verizon VA's proposed interconnection agreement to WorldCom.
2. Exhibit C-3 to Verizon VA's Answer, strike through "or for future growth" in § 11.2.15.3 of Verizon's proposed interconnection agreement to AT&T.

**Before the
FEDERAL COMMUNICATIONS COMMISSION
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))	
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Petition of Cox Virginia Telecom, Inc., etc.)	
))	
In the Matter of)	CC Docket No. 00-251
Petition of AT&T Communications of)	
Virginia Inc., etc.)	

**VERIZON VA'S ERRATA TO VERIZON VA'S UNBUNDLED NETWORK ELEMENTS
REBUTTAL TESTIMONY ON MEDIATION ISSUES (EXHIBIT 24)**

1. On page 4 lines 9-10 and footnote 1, replace "inquiries" with "queries."
2. On page 6 line 19, delete the second "that" and replace "entitled" with "entitle."
3. On page 9 line 10, replace "access" with "local."
4. On page 15 line 5, delete "¶ 14" and replace with "the Executive Summary."
5. On page 15 line 14, delete "¶ 14."

QWEST® COMMUNICATIONS

SERVICE INTERVAL GUIDE FOR RESALE AND INTERCONNECTION SERVICES

QWEST® COMMUNICATIONS

The Resale and Interconnection service guidelines contained herein are subject to change at anytime by QWEST.
Please refer to the Web location (<http://www.qwest.com/wholesale/guides/sig/index.html>) for the most current copy.

Service Interval Guide for Resale and Interconnection Services

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Service Interval Guide for Resale and Interconnection Services

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The Resale and Interconnection service guidelines contained herein are subject to change at anytime by QWEST.
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QWEST® COMMUNICATIONS

Service Interval Guide for Resale and Interconnection Services

Number Portability - Interim

Installation Guidelines apply where facilities/network capacity is in place. Where facilities/network capacity are not in place, intervals are handled on an Individual Case Basis (ICB). Orders received after 3:00 p.m. are considered the next business day.

Product	Activity/ Features	Services Ordered	FOC Guidelines	Installation Guidelines	Repair Guidelines
1FR or 1FB		1 to 49 Lines Ported	24 hrs	Three (3) Business Days	24 hrs for Ported TNs OOS
		50 or more Lines Ported	192 hrs	ICB	24 hrs for Ported TNs OOS
			192 hrs		
Complex Services (i.e., PBX, Trunks, ISDN, etc.)		1 to 8 Lines or Trunks Ported	24 hrs	Five (5) Business Days	24 hrs for Ported TNs OOS
		9 to 16 Lines or Trunks Ported	48 hrs	Six (6) Business Days	24 hrs for Ported TNs OOS
		17 to 24 Lines or Trunks Ported	48 hrs	Seven (7) Business Days	24 hrs for Ported TNs OOS
		25 or more Lines or Trunks Ported	192 hrs	ICB	24 hrs for Ported TNs OOS
Centrex		1 to 10 Lines Ported	72 hrs	Five (5) Business Days	24 hrs for Ported TNs OOS
		11 to 20 Lines Ported	120 hrs	Ten (10) Business Days	24 hrs for Ported TNs OOS
		21 or more Lines Ported	192 hrs	ICB	24 hrs for Ported TNs OOS
Out of Hours Conversion, and, 400 or more Telephone Numbers		Any	192 hrs	ICB	24 hrs for Ported TNs OOS

Notes: All LSR's received for INP service trigger review of the CLEC's LIS trunking network to determine if direct end office-to-CLEC trunking exists or is required. Standard hours of business for INP are M-F, 7:00 a.m. - 7:00 p.m. for the time zone where the activity is going to take place.

The Resale and Interconnection service guidelines contained herein are subject to change at anytime by QWEST. Please refer to the Web location (<http://www.qwest.com/wholesale/guides/sig/index.html>) for the most current copy.

QWEST® COMMUNICATIONS

Service Interval Guide for Resale and Interconnection Services

Number Portability - Local

Installation Guidelines apply where facilities/network capacity is in place. Where facilities/network capacity are not in place, intervals are handled on an Individual Case Basis (ICB).

Product	Activity/ Features	Services Ordered	FOC Guidelines	Installation Guidelines	Repair Guidelines
Simple (1FR / 1FB)		1 to 5 Lines	24 hrs	Three (3) Business Days	24 hrs for Ported TNs OOS
		6 to 50 Lines Ported	24 hrs	Four (4) Business Days	24 hrs for Ported TNs OOS
		51 or more Lines Ported	ICB	ICB	24 hrs for Ported TNs OOS
Complex Services (PBX, Trunks, ISDN, Centrex)		1 to 25 Lines or Trunks Ported	24 hrs	Five (5) Business Days	24 hrs for Ported TNs OOS
		26 or more Lines or Trunks Ported	ICB	ICB	24 hrs for Ported TNs OOS

Per the North American Numbering Council (NANC) guidelines, the FOC date starts the due date calculation for Local Number Portability.

The Resale and Interconnection service guidelines contained herein are subject to change at anytime by QWEST.
Please refer to the Web location (<http://www.qwest.com/wholesale/guides/sig/index.html>) for the most current copy.

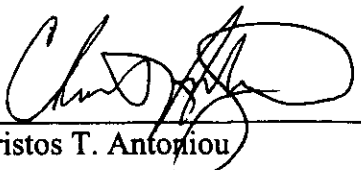
**ERRATA TO
VERIZON VA's JULY 31 (Exhibit 1), AUGUST 17 (Exhibits 8 and 15), AND
SEPTEMBER 5 (Exhibit 23) TESTIMONY
ON THE MEDIATION AND NON-MEDIATION ISSUES FOR
UNBUNDLED NETWORK ELEMENTS**

- Add Christos T. Antoniou as a witness to the Unbundled Network Elements Panel as adopting the testimony therein as pertinent to Issues III-6, III-7, III-8, III-9, VI-3(B), and IV-14 and incorporating his previously filed testimony pertinent to Issue Nos. IV-15 and VI-1(E) as contained in Verizon VA's August 17 (Exhibits 13 and 22) and September 5 (Exhibit 30) General Terms and Conditions testimony. His declaration and verification is attached as pertinent to the amendment of the Unbundled Network Element Panel testimony. His declaration and verification were already attached to his previously filed General Terms and Conditions testimony.
- Add John White as a witness to Unbundled Network Elements Panel, incorporating his previously filed testimony pertinent to Issue No. VII-10 as contained in Verizon VA's July 31 (Exhibit 2) and August 17 (Exhibit 16) testimony on Advanced Services issues. His declaration and verification were already attached to Exhibit 2 and Exhibit 16.

Declaration of Christos T. Antoniou

I declare under penalty of perjury that I have reviewed the portions of the Unbundled Network Element panel testimony as pertinent to Issues III-6, III-7, III-8, III-9, VI-3(B), and IV-14 and that those sections as to which I testified are true and correct.

Executed this 4th day of October 2001.



Christos T. Antoniou